

# Exhibit 3

**From:** [Layne Hilton](#)  
**To:** [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com); [ruben@honiklaw.com](mailto:ruben@honiklaw.com)  
**Cc:** [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com); [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); [David J. Stanoch](mailto:David J. Stanoch); [OstfeldG@gtlaw.com](mailto:OstfeldG@gtlaw.com); [DTDorner@duanemorris.com](mailto:DTDorner@duanemorris.com); [DKlinges@duanemorris.com](mailto:DKlinges@duanemorris.com)  
**Subject:** Re: Valsartan - Craft Deposition  
**Date:** Wednesday, January 5, 2022 4:52:31 PM

---

Hi Victoria:

We hope that we can avoid the Court's intervention on this matter (especially because Plaintiffs' counsel will be participating remotely as well). However, if Ms. Craft's wishes remain the same by the next discovery CMC on January 18<sup>th</sup>, and Defendants have not confirmed whether they will assent to a fully remote deposition, please note that Plaintiffs will raise the issue with the Special Master at that time.

Best,

Layne

---

**From:** "lockardv@gtlaw.com" <lockardv@gtlaw.com>  
**Date:** Wednesday, January 5, 2022 at 3:29 PM  
**To:** Layne Hilton <l.hilton@kanner-law.com>, "ruben@honiklaw.com" <ruben@honiklaw.com>  
**Cc:** "DECValsartan@btlaw.com" <DECValsartan@btlaw.com>, "rgeman@lchb.com" <rgeman@lchb.com>, "mpatronella@classlawdc.com" <mpatronella@classlawdc.com>, "nmigliaccio@classlawdc.com" <nmigliaccio@classlawdc.com>, "kmadiraju@lchb.com" <kmadiraju@lchb.com>, Valsartan PEC <valpec@kirtlandpackard.com>, "David J. Stanoch" <d.stanoch@kanner-law.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "DTDorner@duanemorris.com" <DTDorner@duanemorris.com>, "DKlinges@duanemorris.com" <DKlinges@duanemorris.com>  
**Subject:** RE: Valsartan - Craft Deposition

Hi Layne,

We are discussing the request below among defense counsel, but given how quickly things change with these waves, we think it makes sense to revisit closer in time to the deposition.

Thanks, Victoria

**Victoria Davis Lockard**

Shareholder

Greenberg Traurig, LLP | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305

Tel 678.553.2103 | Fax 678-553-2104

[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



---

**From:** Layne Hilton <l.hilton@kanner-law.com>

**Sent:** Tuesday, January 4, 2022 5:04 PM

**To:** Ruben Honik <ruben@honiklaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>

**Cc:** DECValsartan@btlaw.com; rgeman@lchb.com; mpatronella@classlawdc.com; nmigliaccio@classlawdc.com; kmadiraju@lchb.com; valpec@kirtlandpackard.com; David J. Stanoch <d.stanoch@kanner-law.com>

**Subject:** Valsartan - Craft Deposition

Victoria:

I write regarding the deposition of Laura Craft.

Ms. Craft has requested that her deposition (set for February 9<sup>th</sup>) be conducted remotely via Zoom. While Ms. Craft was initially prepared personally appear for her deposition, given the current COVID case trajectory of the last few weeks, she no longer wishes to proceed in that manner. Ms. Craft has recently started caring for a newborn grandchild in the evenings, and she believes the risks are too high given the totality of the circumstances.

To respect her wishes, Plaintiffs will be appearing remotely as well.

Please confirm that Defendants will agree with this request.

Best,

Layne Hilton

---

**From:** Layne Hilton

**Sent:** Wednesday, December 15, 2021 1:43 PM

**To:** Ruben Honik <[ruben@honiklaw.com](mailto:ruben@honiklaw.com)>; [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)

**Cc:** [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com); [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>

**Subject:** RE: Deposition date for Dr. Kaplan - Med Mon

Victoria:

We confirm the following locations for the class expert depositions:

Conti: Boston, MA

Craft: Near Emeryville, CA (Bay Area)

Najafi: Near Alameda, CA (Bay Area)

Quick: Austin, TX

Panagos: Miami, FL  
Kaplan: Chicago, IL  
Song: Boston, MA

Thanks,

Layne

---

**From:** Ruben Honik <[ruben@honiklaw.com](mailto:ruben@honiklaw.com)>  
**Sent:** Tuesday, December 14, 2021 12:23 PM  
**To:** [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com)  
**Cc:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>; [DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com); [rgeman@lchb.com](mailto:rgeman@lchb.com); [mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com); [nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** Re: Deposition date for Dr. Kaplan - Med Mon

We are not holding the following day for any of the experts and are proposing limiting the duration of the examination of several of these experts. Our position will be reflected in the agenda letter soon to be sent to the court and defense counsel.

Others on our team will address the remaining “logistical” questions you raise.

Ruben Honik, Esq.  
Honik LLC  
1515 Market Street  
Suite 1100  
Philadelphia, Pa. 19102  
O: 267-435-1300  
M: 215-327-9166  
[ruben@honiklaw.com](mailto:ruben@honiklaw.com)  
[www.honiklaw.com](http://www.honiklaw.com)

On Dec 10, 2021, at 12:35 PM, [lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) wrote:

We can set January 19<sup>th</sup> for Kaplan. Do you have dates for Conti?

Also can you confirm all the experts are holding the following day in case we need it?

Can you also confirm location for all?

**Victoria Davis Lockard**  
Shareholder

Greenberg Traurig, LLP | 3333 Piedmont Road NE | Suite 2500 | Atlanta, GA 30305  
Tel 678.553.2103 | Fax 678-553-2104  
[lockardv@gtlaw.com](mailto:lockardv@gtlaw.com) | [www.gtlaw.com](http://www.gtlaw.com)



---

**From:** Layne Hilton <[l.hilton@kanner-law.com](mailto:l.hilton@kanner-law.com)>  
**Sent:** Monday, December 6, 2021 3:01 PM  
**To:** 'DECValsartan@btlaw.com' <[DECValsartan@btlaw.com](mailto:DECValsartan@btlaw.com)>  
**Cc:** [rgeman@lchb.com](mailto:rgeman@lchb.com); Mark Patronella <[mpatronella@classlawdc.com](mailto:mpatronella@classlawdc.com)>;  
[nmigliaccio@classlawdc.com](mailto:nmigliaccio@classlawdc.com); [kmadiraju@lchb.com](mailto:kmadiraju@lchb.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com);  
David J. Stanoch <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>  
**Subject:** [EXTERNAL]Deposition date for Dr. Kaplan - Med Mon

**\*EXTERNAL TO GT\***

Counsel:

We can provide either January 19<sup>th</sup> or February 2<sup>nd</sup> for Dr. Kaplan's deposition. Please let me know whether either of these dates works for Defendants.

Thanks,

Layne

Layne Hilton  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130  
(504) 524-5777 voice  
(504) 524-5763 fax  
[www.kanner-law.com](http://www.kanner-law.com)

---

THIS EMAIL MESSAGE IS FOR THE SOLE USE OF THE INTENDED RECIPIENT(S) AND MAY CONTAIN CONFIDENTIAL AND PRIVILEGED INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER BY REPLY EMAIL AND DESTROY ALL COPIES OF THE ORIGINAL MESSAGE.

---

#### Disclaimer

The information contained in this communication from the sender is confidential. It is intended

solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

CONFIDENTIALITY NOTICE: This email and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return email and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

---

If you are not an intended recipient of confidential and privileged information in this email, please delete it, notify us immediately at [postmaster@gtlaw.com](mailto:postmaster@gtlaw.com), and do not use or disseminate the information.